Excellence in Compliance Testing

Certification Test Report

FCC ID: U5PKEVSPASS
IC: 7307A-KEVSPASS

FCC Rule Part: 15.249
IC Radio Standards Specification: RSS-210

ACS Report Number: 08-0118 - 15C

Manufacturer: International Safety Instruments, Inc.
Model: 125181

Test Begin Date: March 31, 2008
Test End Date: April 1, 2008

Report Issue Date: December 18, 2008

FOR THE SCOPE OF ACCREDITATION UNDER LAB Code 200612-0

This report is not be used to claim certification, approval, or endorsement by NVLAP, NIST or any government agency.

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This report contains 17 pages

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Additional Exhibits Included In Filing

Internal Photographs	**Schematics**
External Photographs	**Manual**
Test Setup Photographs	**Theory of Operation**
Label Information	**System Block Diagram**

1.0 GENERAL

1.1 Purpose

The purpose of this report is to demonstrate compliance with Part 15, Subpart C of the FCC's Code of Federal Regulations and IC standard RSS-210.

1.2 Product Description

1.2.1 General

The Remote Auto PASS (personal alert safety system) or RAP is an automatic distress alarm. It will emit a warning sound if the wearer stops moving or depresses the panic alarm. The RAP will only work in conjunction with a properly configured wireless console.

Manufacturer Information:
Avon-ISI
922 Hurricane Shoals Rd.
Lawrenceville, GA 30043
770-962-2552

Test Sample Serial Number(s):
3

Test Sample Condition:
The test samples were provided in good working order with no visible defects.

Detailed photographs of the EUT are filed separately with this filing.

1.2.2 Intended Use

The Remote Auto PASS (personal alert safety system) or RAP is an automatic distress alarm.

2.0 TEST FACILITIES

2.1 Location

The radiated and conducted emissions test sites are located at the following address:

Advanced Compliance Solutions
5015 B.U. Bowman Drive
Buford, GA 30518
Phone: (770) 831-8048
Fax: (770) 831-8598

2.2 Laboratory Accreditations/Recognitions/Certifications

The Semi-Anechoic Chamber Test Site, Open Area Test Site (OATS) and Conducted Emissions Site have been fully described, submitted to, and accepted by the FCC, Industry Canada and the Japanese Voluntary Control Council for Interference by information technology equipment. In addition, ACS is compliant to ISO 17025 as certified by the National Institute of Standards and Technology under their National Voluntary Laboratory Accreditation Program. The following certification numbers have been issued in recognition of these accreditations and certifications:

FCC Registration Number: 894540
Industry Canada Lab Code: IC 4175
VCCI Member Number: 1831

- VCCI OATS Registration Number R-1526
- VCCI Conducted Emissions Site Registration Number: C-1608

NVLAP Lab Code: 200612-0

2.3 Radiated Emissions Test Site Description

2.3.1 Semi-Anechoic Chamber Test Site

The Semi-Anechoic Chamber Test Site consists of a 20' x 30' x 18' shielded enclosure. The chamber is lined with Toyo Ferrite Grid Absorber, model number FFG-1000. The ferrite tile grid is 101 x 101 x 19mm thick and weighs approximately 550 grams. These tiles are mounted on steel panels and installed directly on the inner walls of the chamber.

The turntable is 150cm in diameter and is located 160cm from the back wall of the chamber. The chamber is grounded via 1 - 8' copper ground rod, installed at the center of the back wall, it is bound to the ground plane using 3/4" stainless steel braided cable.

The turntable is all steel, flush mounted table installed in an all steel frame. The table is remotely operated from inside the control room located 25' from the range. The turntable is electrically bonded to the surrounding ground plane via steel fingers installed on the edge of the turn table. The steel fingers make constant contact with the ground plane during operation.

Behind the turntable is a 3' x 6' x 4' deep shielded pit used for support equipment if necessary. The pit is equipped with 1 - 4" PVC chases from the turntable to the pit that allow for cabling to the EUT if necessary. The underside of the turntable can be accessed from the pit so cables can be supplied to the EUT from the pit.

A diagram of the Semi-Anechoic Chamber Test Site is shown in Figure 2.3-1 below:

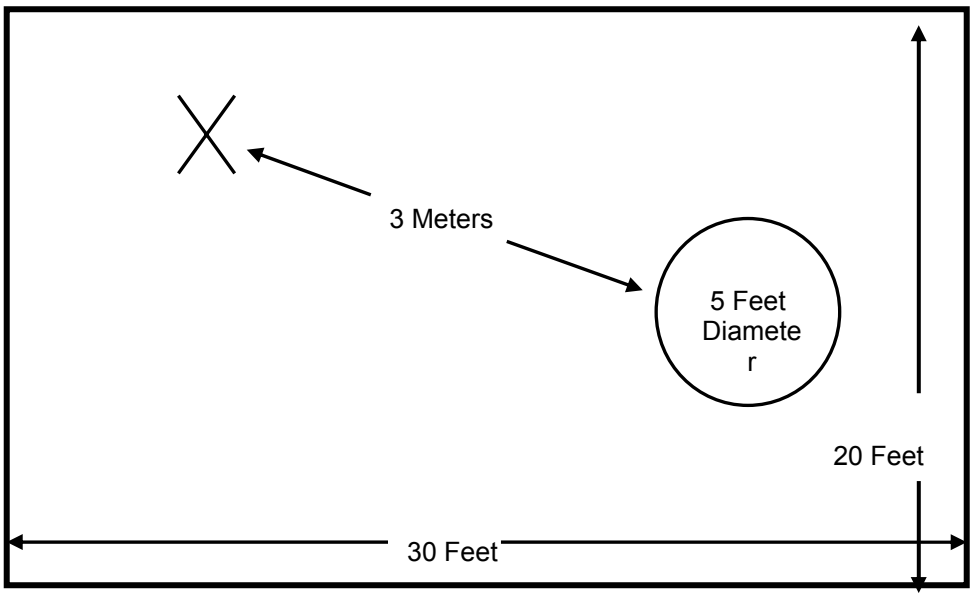

Figure 2.3-1: Semi-Anechoic Chamber Test Site

2.3.2 Open Area Tests Site (OATS)

The open area test site consists of a 40' x 66' concrete pad covered with a perforated electro-plated galvanized sheet metal. The perforations in the sheet metal are 1/8" holes that are staggered every 3/16". The individual sheets are placed to overlap each other by 1/4" and are riveted together to provide a continuous seam. Rivets are spaced every 3" in a 3 x 20 meter perimeter around the antenna mast and EUT area. Rivets in the remaining area are spaced as necessary to properly secure the ground plane and maintain the electrical continuity.

The entire ground plane extends 12' beyond the turntable edge and 16' beyond the antenna mast when set to a 10 meter measurement distance. The ground plane is grounded via 4 - 8' copper ground rods, each installed at a corner of the ground plane and bound to the ground plane using 3/4" stainless steel braided cable.

The turntable is an all aluminum 10' flush mounted table installed in an all aluminum frame. The table is remotely operated from inside the control room located 40' from the range. The turntable is electrically bonded to the surrounding ground plane via steel fingers installed on the edge of the turn table. The steel fingers make constant contact with the ground plane during operation.

Adjacent to the turntable is a 7' x 7' square and 4' deep concrete pit used for support equipment if necessary. The pit is equipped with 5 - 4" PVC chases from the pit to the control room that allow for cabling to the EUT if necessary. The underside of the turntable can be accessed from the pit so cables can be supplied to the EUT from the pit. The pit is covered with 2 sheets of 1/4" diamond style re-enforced steel sheets. The sheets are painted to match the perforated steel ground plane; however the underside edges have been masked off to maintain the electrical continuity of the ground plane. All reflecting objects are located outside of the ellipse defined in ANSI C63.4.

A diagram of the Open Area Test Site is shown in Figure 2.3-2 below:

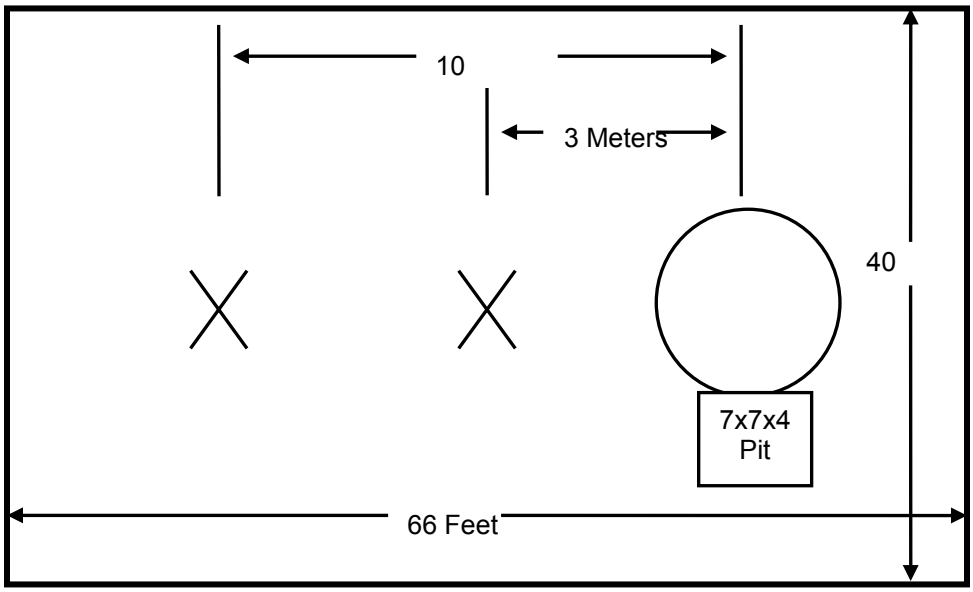

Figure 2.3-2: Open Area Test Site

2.4 Conducted Emissions Test Site Description

The AC mains conducted EMI site is located in the main EMC lab. It consists of an 8' x 8' solid aluminum horizontal group reference plane (GRP) bonded every 3" to an 8' X 8' vertical ground plane.

The site is of sufficient size to test table top and floor standing equipment in accordance with section 6.1.4 of ANSI C63.4.

A diagram of the room is shown below in figure 4.1.3-1:

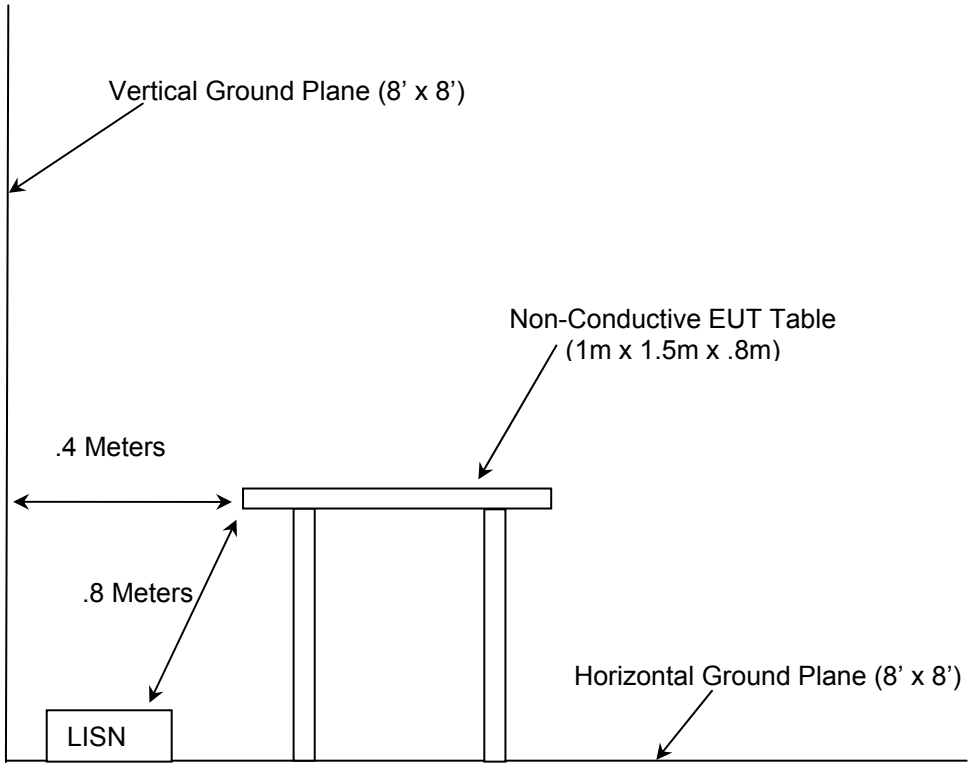

Figure 2.4-1: AC Mains Conducted EMI Site

3.0 APPLICABLE STANDARD REFERENCES

The following standards were used:

- ANSI C63.4-2003: Method of Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the 9KHz to 40GHz
- US Code of Federal Regulations (CFR): Title 47, Part 2, Subpart J: Equipment Authorization Procedures, 2008
- US Code of Federal Regulations (CFR): Title 47, Part 15, Subpart C: Radio Frequency Devices, Intentional Radiators, 2008
- Industry Canada Radio Standards Specification: RSS-210 - Low-power License-exempt Radiocommunication Devices (All Frequency Bands): Category I Equipment, Issue 7 June 2007
- Industry Canada Radio Standards Specification: RSS-GEN – General Requirements and Information for the Certification of Radiocommunication Equipment, Issue2, June 2007.

4.0 LIST OF TEST EQUIPMENT

The calibration interval of test equipment is annually or the manufacturer's recommendations. Where the calibration interval deviates from the annual cycle based on the instrument manufacturer's recommendations, it shall be stated below.

Table 4-1: Test Equipment

Equipment Calibration Information					
ACS #	**Mfg.**	**Model**	**S/N**	**Equipment Type**	**Cal. Due**
338	Hewlett Packard	8449B	3008A01111	Amplifier	10/24/08
329	A.H. Systems	SAS-571	721	Antenna	8/13/08
291	Florida RF Cables	SMRE-200W-12.0-SMRE	None	Cable	11/21/08 (See Note1)
292	Florida RF Cables	SMR-290AW-480.0-SMR	None	Cable	11/21/08 (See Note1)
73	Agilent	8447D	2727A05624	Amplifier	12/19/08
22	Agilent	8449B	3008A00526	Amplifier	10/25/08
25	Chase	CBL6111	1043	Antenna	6/6/08
167	ACS	Chamber EMI Cable Set	167	Cable Set	1/4/09
283	Rohde and Schwarz	FSP40	1000033	Spectrum Analyzer	11/9/08
1	Rohde and Schwarz	ESMI Display	833771/007	Receiver Display	10/26/08
2	Rohde and Schwarz	ESMI -Receiver	839587/003	ESMI Receiver	10/26/08

Note1: Items characterized on an annual cycle. The date shown indicates the next characterization due date.

5.0 SUPPORT EQUIPMENT

Table 5-1: Support Equipment

Item	Equipment Type	Manufacturer	Model Number	Serial Number
1	EUT	Avon-ISI	125181	3

6.0 EQUIPMENT UNDER TEST SETUP BLOCK DIAGRAMS

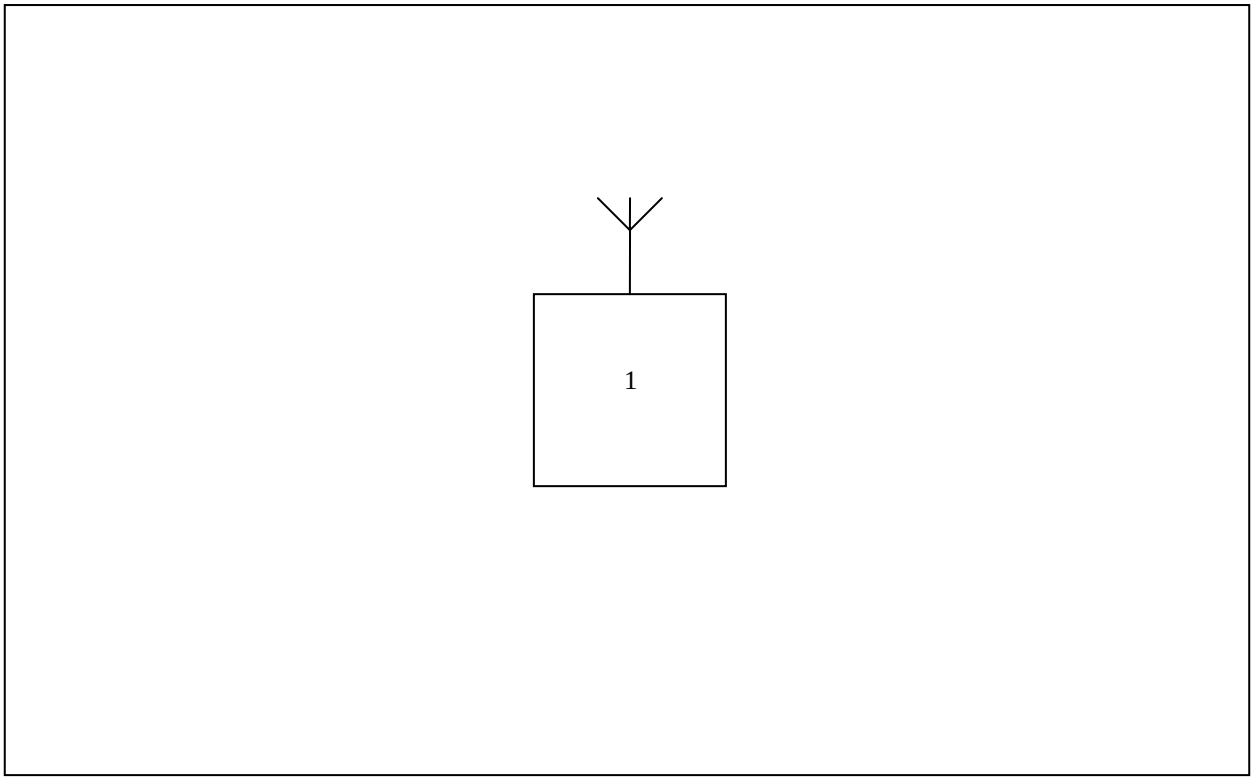

Figure 6-1: EUT Test Setup

*See Test Setup photographs for additional detail.

7.0 SUMMARY OF TESTS

Along with the tabular data shown below, plots were taken of all signals deemed important enough to document.

7.1 Antenna Requirement – FCC: Section 15.203

The antenna is an inverted F integral to the pcb, -15dBi gain.

7.2 Power Line Conducted Emissions – FCC: Section 15.207 IC: RSS-Gen 7.2.2

The EUT is powered by an internal battery and is therefore not designed to be connected to the public utility (AC) power line. No Power line conducted emissions testing was performed.

7.3 Radiated Emissions – FCC: Section 15.109(Unintentional Radiation) IC: RSS-210 2.6

7.3.1 Test Methodology

Radiated emissions tests were performed over the frequency range of 30MHz to 12.5GHz. Measurements of the radiated field strength were made at a distance of 3m from the boundary of the equipment under test (EUT) and the receiving antenna. The antenna height was varied from 1m to 4m so that the maximum radiated emissions level would be detected. For frequencies below 1000 MHz a Quasi-peak detector was enabled and measurements were taken with the Spectrum Analyzer's resolution bandwidth set to 120 KHz. For frequencies above 1000MHz, average measurements were made using an average detector and peak detector with RBW of 1 MHz.

7.3.2 Test Results

Results of the test are given in Table 7.3-1 below:

Table 7.3-1 – Radiated Emissions (Unintentional)

Frequency (MHz)	Level (dBuV)		Antenna Polarity	Correction Factors	Corrected Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg	(H/V)	(dB)	pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
272.5	---------	25.23	H	-12.48	---------	12.76	--------	46.0	---------	33.25
280.04	---------	34.68	H	-12.40	---------	22.28	--------	46.0	---------	23.72
288.67	---------	25.28	H	-12.14	---------	13.14	--------	46.0	---------	32.86
304.83	---------	25.18	H	-11.75	---------	13.43	--------	46.0	---------	32.57
591.52	---------	26.86	H	-4.78	---------	22.08	--------	46.0	---------	23.92
957.97	---------	26.48	V	2.60	---------	29.08	--------	46.0	---------	16.92

* Note: All emissions above 957.97MHz were not detected above the noise floor of the measurement equipment and therefore attenuated below the permissible limit.

7.4 Occupied Bandwidth – FCC: Section 15.215

7.4.1 Test Methodology

The spectrum analyzer span was set to 2 to 3 times the estimated bandwidth of the emission. The RBW was to ≥ 1% of the estimated emission bandwidth. The trace was set to max hold with a peak detector active. Bandwidth is determined at the points 20 dB down from the modulated carrier.

7.4.2 Test Results

The maximum 20dB bandwidth was determined to be 2.65 MHz. The frequency band designated under Part 15.249 is 2400 - 2483.5MHz therefore the 20dB bandwidth is contained within the frequency band designated under this rule part.

Results are shown below in Table 7.4.2-1 and Figures 7.4.2-1 through 7.4.2-3.

Table 7.4.2-1

Frequency (MHz)	20dB Bandwidth (kHz)
2405	2640
2440	2650
2480	2640

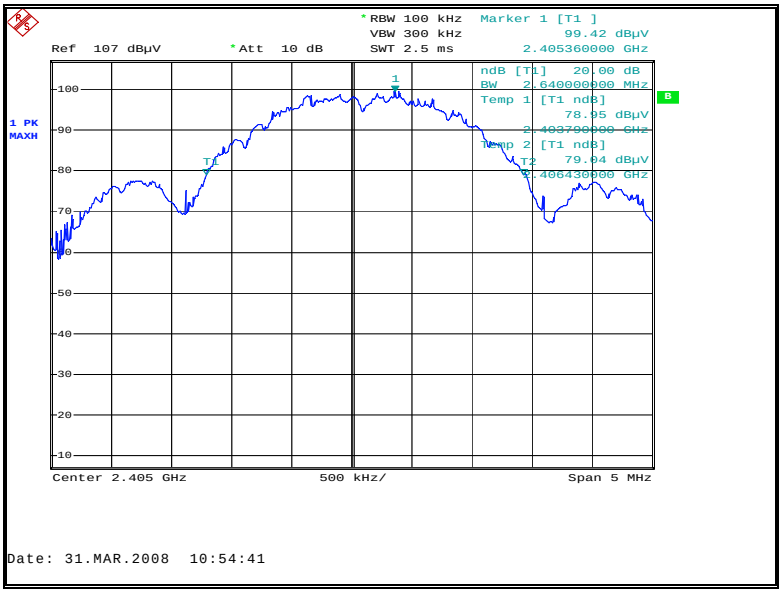

Figure 7.4.2-1: 20dB Bandwidth Low Channel

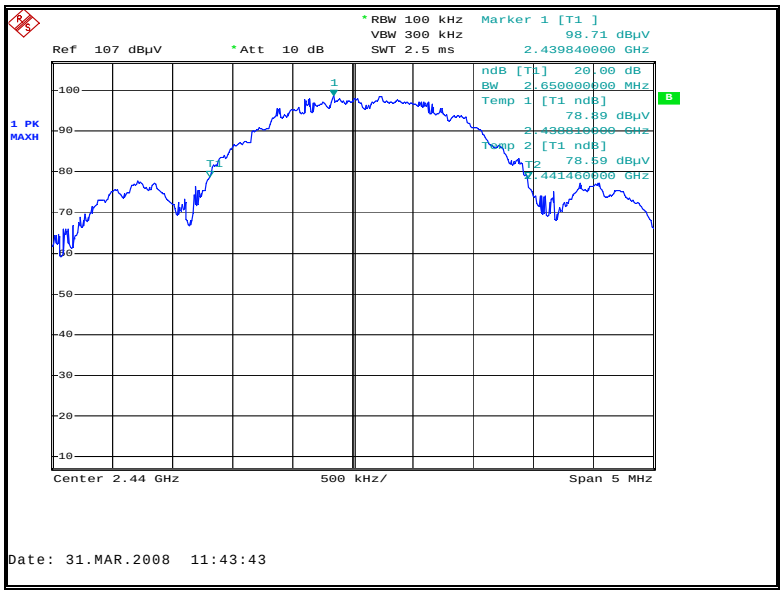

Figure 7.4.2-2: 20dB Bandwidth Mid Channel

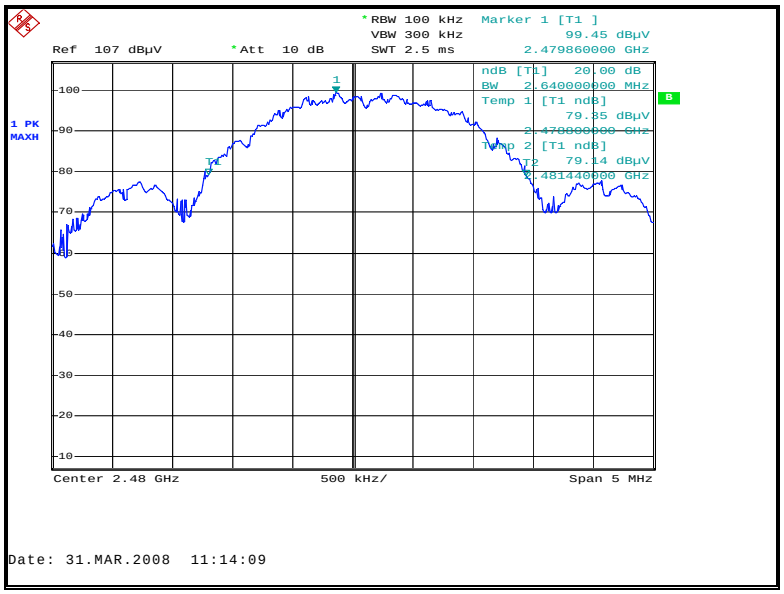

Figure 7.4.2-3: 20dB Bandwidth High Channel

7.5 Fundamental Field Strength – FCC: Section 15.249(a) IC: RSS-210 A2.9(a)

7.5.1 Test Methodology

Radiated emissions tests were made on the 3 channels in the 2400MHz to 2483.5MHz frequency range, the low channel being 2405 MHz, the middle channel being 2440 MHz, and the high channel being 2480 MHz.

The EUT was rotated through 360° and the receive antenna height was varied from 1m to 4m so that the maximum radiated emissions level would be detected. Peak measurements were made using a resolution bandwidth (RBW) of 1 MHz and a video bandwidth (VBW) of 3 MHz. The EUT could not be put into a continuous mode of operation therefore average measurements were calculated by reducing the peak emission level by the duty cycle.

7.5.2 Duty Cycle Correction

For average radiated measurements, the measured level was reduced by a factor 19.66dB to account for the duty cycle of the EUT. The duty cycle was determined to be 10.4% or 10.4ms within a 100ms period. The duty cycle correction factor is determined using the formula: 20*log(0.104) = -19.66dB. The duty cycle of the EUT is shown in Figures 7.5.2-1 to 7.5.2-3 below.

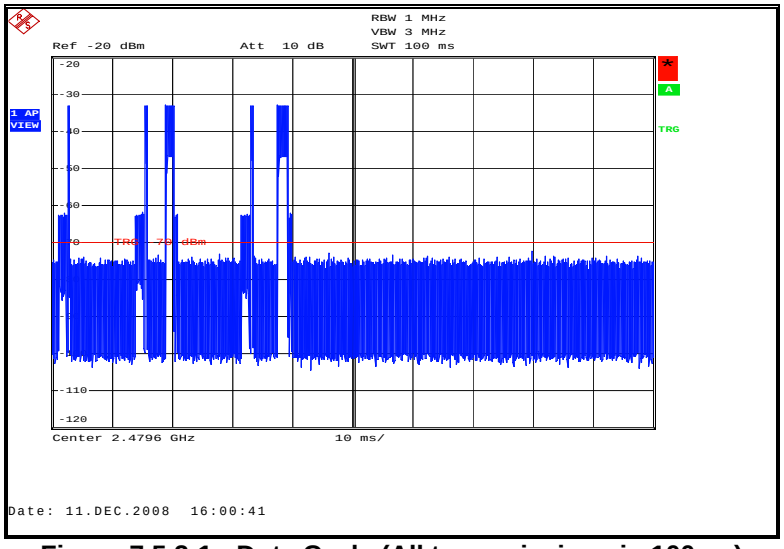

Figure 7.5.2-1: Duty Cycle (All transmissions in 100ms)

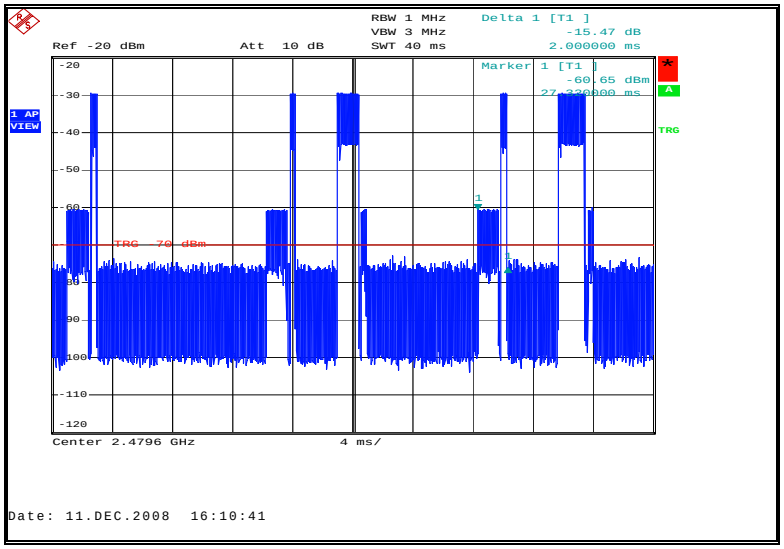

Figure 7.5.2-2: Duty Cycle (Initial 4 transmissions - 2ms)

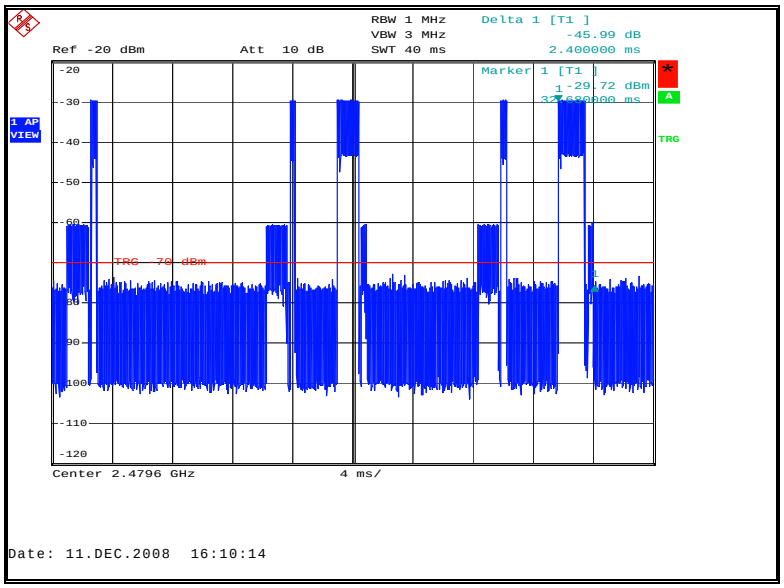

Figure 7.5.2-3: Duty Cycle (Last transmission – 2.4ms)

7.5.3 Test Results

Results are shown below in table 7.5.3-1 below:

Table 7.5.3-1: Fundamental Field Strength

Frequency (MHz)	Level (dBuV)		Antenna Polarity	Correction Factors	Corrected Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg	(H/V)	(dB)	pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
Low Channel										
2405	103.59	103.59	H	-4.39	99.20	79.54	114.0	94.0	14.78	14.44
2405	100.78	100.78	V	-4.53	96.25	76.59	114.0	94.0	17.73	17.39
Mid Channel										
2440	102.85	102.85	H	-4.23	98.62	78.96	114.0	94.0	15.36	15.02
2440	100.05	100.05	V	-4.39	95.66	76.00	114.0	94.0	18.32	17.98
High Channel										
2480	103.62	103.62	H	-4.04	99.58	79.92	114.0	94.0	14.40	14.06
2480	103.13	103.13	V	-4.23	98.90	79.24	114.0	94.0	15.08	14.74

7.6 Band-Edge Compliance and Spurious Emissions – FCC: Section 15.249 IC: RSS-210 A2.9

7.6.1 Band-Edge Compliance – FCC: Section 15.249(d) IC: RSS-210 A2.9(b)

7.6.1.1 Test Methodology

Emissions radiated outside of the specified frequency bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits in § 15.209, whichever is the lesser attenuation.

The EUT was investigated at the low and high channels of operation to determine band-edge compliance. Band-edge compliance for the lower and upper band-edge was determined using the radiated mark-delta method as outlined in FCC DA 00-705. The radiated field strength of the fundamental emission was first determined and then the mark-delta method was used to determine the field strength of the band-edge emissions as compared to the emission limits of 15.209.

7.6.1.2 Test Results

Band-edge compliance is displayed in Tables 7.6.2-1 to 7.6.2-2 and Figures 7.6.2-1 – 7.6.2-2.

Table 7.6.2-1: Lower Band-edge Marker Delta Method

Frequency (MHz)	Uncorrected Level (dBuV)		Antenna Polarity (H/V)	Correction Factors (dB)	Fundamental Level (dBuV/m)		Marker-Delta (dB)	Band-Edge Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg			pk	Qpk/Avg		pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
2405	103.59	103.59	H	-4.39	99.20	79.54	40.61	58.59	38.93	74.0	54.0	15.41	15.07

Table 7.6.2-2: Upper Band-edge Marker Delta Method

Frequency (MHz)	Uncorrected Level (dBuV)		Antenna Polarity (H/V)	Correction Factors (dB)	Fundamental Level (dBuV/m)		Marker-Delta (dB)	Band-Edge Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg			pk	Qpk/Avg		pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
2480	103.62	103.62	H	-4.04	99.58	79.92	32.28	67.30	47.64	74.0	54.0	6.70	6.36

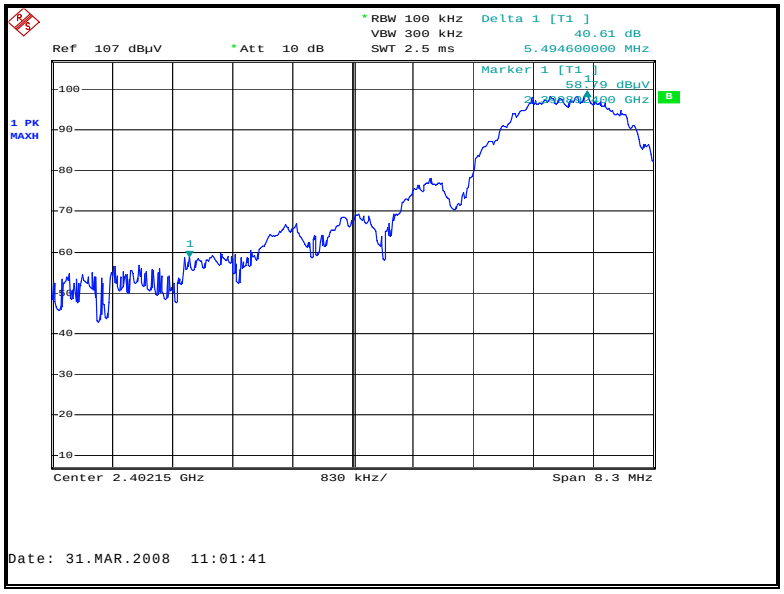

Figure 7.6.1.2-1 Lower Band-edge

Figure 7.6.1.2-2 Upper Band-edge

7.6.2 Radiated Spurious Emissions – FCC: Section 15.249(a), (c) IC:RSS-210 A2.9(a)

7.6.2.1 Test Methodology

Radiated emissions tests were made over the frequency range of 30MHz to 25 GHz, 10 times the highest fundamental frequency.

The EUT was rotated through 360° and the receive antenna height was varied from 1m to 4m so that the maximum radiated emissions level would be detected. Peak measurements were made using a resolution bandwidth (RBW) of 1 MHz and a video bandwidth (VBW) of 3 MHz. The EUT could not be put into a continuous mode of operation therefore average measurements were calculated by reducing the peak emission level by the duty cycle.

7.6.2.2 Duty Cycle Correction

For average radiated measurements, the measured level was reduced by a factor 19.66dB to account for the duty cycle of the EUT. See section 7.5.2 for the duty cycle justification.

7.6.2.3 Test Results

Radiated spurious emissions found in the band of 30MHz to 25GHz are reported in Table 7.6.2.3-1.

Table 7.6.2.3-1: Radiated Spurious Emissions

Frequency (MHz)	Level (dBuV)		Antenna Polarity	Correction Factors	Corrected Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg	(H/V)	(dB)	pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
Low Channel										
4810	52.52	52.52	H	1.84	54.36	34.70	74.0	54.0	19.64	19.30
4810	52.44	52.44	V	2.14	54.58	34.92	74.0	54.0	19.42	19.08
Middle Channel										
4880	52.01	52.01	H	2.14	54.15	34.49	74.0	54.0	19.85	19.51
4880	51.50	51.50	V	2.44	53.94	34.28	74.0	54.0	20.06	19.72
High Channel										
4960	52.22	52.22	H	2.49	54.71	35.05	74.0	54.0	19.29	18.95
4960	52.39	52.39	V	2.79	55.18	35.52	74.0	54.0	18.82	18.48

***** *The magnitude of all emissions not reported were below the noise floor of the measurement system.*

7.6.2.4 Sample Calculation:

$R_C = R_U + CF_T$

Where:

CF_T	=	Total Correction Factor (AF+CA+AG)-DC (Average Measurements Only)
R_U	=	Uncorrected Reading
R_C	=	Corrected Level
AF	=	Antenna Factor
CA	=	Cable Attenuation
AG	=	Amplifier Gain
DC	=	Duty Cycle Correction Factor

Example Calculation

PEAK:
Corrected Level: 52.52 + 1.84 = 54.36dBuV
Margin: 74dBuV – 54.36dBuV = 19.64dB

AVERAGE:
Corrected Level: 52.52 + 1.84 - 19.66 = 34.70dBuV
Margin: 54dBuV – 34.70dBuV = 19.30dB

8.0 CONCLUSION

In the opinion of ACS, Inc. the 125181 manufactured by Avon-ISI meets the requirements of FCC Part 15 subpart C and IC RSS-210.

END REPORT